

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

2012 MAY 31 PM 1:41

UNITED STATES OF AMERICA,

Plaintiff,

v.

[1] MARIBEL RODRIGUEZ-FRAGOSO,

a/k/a "La Flaca" or "La Nena,"

(Counts 1-2 and 10-11)

[2] ANGEL HERNANDEZ-NUNEZ,

a/k/a "Angelito,"

(Counts 1-2 and 10-11)

[3] VICTOR GONZALEZ-CRUZ,

a/k/a "Machote,"

(Counts 1-2, 3, 5, 6-9, and 14)

[4] JOSE DAVID SANJURJO-CARILLO,

a/k/a "Pipo" or "Gasolinera,"

(Counts 1-2, 11, and 15)

[5] ALEXANDER CALDERON-LOPEZ,

a/k/a "El De Puertos,"

(Counts 1-2, 4, and 10)

[6] CARLOS NATAL-SILVA,

a/k/a "Carli" or "Carlitos,"

(Counts 1-2, 9, and 14)

[7] FELIX AQUINO-HIRALDO,

a/k/a "Gordo,"

(Counts 1-2 and 10)

[8] JOSE CASTRO-ARROYO,

a/k/a "Flo,"

(Counts 1-2 and 6)

[9] CHRISTIAN ESCALERA-RODRIGUEZ,

a/k/a "Alexis,"

(Counts 1-2 and 13-14)

[10] EDWIN SAMUEL LISBOA-GARCIA,

(Counts 1-2)

[11] JOSE E. NAVARRO-RIVERA,

a/k/a "Label,"

(Counts 1-2)

[12] LUIS D. VAZQUEZ-RIVERA,

(Counts 1-2 and 12)

INDICTMENT

CRIMINAL NO. 12- 434 (CC)

**VIOLATIONS:**

18 U.S.C. § 1962(d)

21 U.S.C. § 841

21 U.S.C. § 846

18 U.S.C. § 2

**FORFEITURE:**

18 U.S.C. § 1963

21 U.S.C. § 853

**SIXTEEN COUNTS**

[13] NICOLAS RIVERA-LUCIANO,  
(Counts 1-2 and 16)  
[14] LUIS AYALA-HERRERA,  
a/k/a "Dre,"  
(Counts 1-2 and 16)  
[15] MARIO MACEIRA-ESPIRITUSANTO,  
(Counts 1-2 and 13-14)  
[16] HUGO E. OQUENDO-ALEJANDRO,  
(Counts 1-2)  
[17] GERARDO I. BETANCOURT-ESTRELLA,  
(Counts 1-2)  
[18] NELSON ORTIZ-CHERVONY,  
a/k/a "Ciego,"  
(Counts 1-2)  
[19] ORSI GERMAN RODRIGUEZ-  
CONTRERAS,  
(Counts 1-2 and 8)  
[20] RUDOLFO TORRES-CORTES,  
a/k/a "Rudy,"  
(Counts 1-2 and 16)  
[21] JOSE OMAR CARABALLO-NIEVES,  
(Counts 2 and 4)  
[22] EUGENE A. ROMERO-SANTIAGO,  
(Counts 2 and 4)  
[23] ANGEL L. MORALES-SEDA,  
a/k/a "Angelito,"  
(Counts 2 and 15)  
[24] ARMANDO MEDINA-GUZMAN, and  
(Counts 2 and 16)  
[25] JESUS MANUEL LAUREANO-PEREZ,  
(Counts 2 and 12)

Defendants.

**THE GRAND JURY CHARGES:**

**COUNT ONE**  
**(Racketeer Influenced and Corrupt Organizations Act)**

**The Enterprise**

1. At various times relevant to this Indictment, [1] MARIBEL RODRIGUEZ-

FRAGOSO, a/k/a "La Flaca" or "La Nena," [2] ANGEL HERNANDEZ-NUNEZ, a/k/a "Angelito," [3] VICTOR GONZALEZ-CRUZ, a/k/a "Machote," [4] JOSE DAVID SANJURJO-CARILLO, a/k/a "Pipo" or "Gasolinera," [5] ALEXANDER CALDERON-LOPEZ, a/k/a "El De Puertos," [6] CARLOS NATAL-SILVA, a/k/a "Carli" or "Carlitos," [7] FELIX AQUINO-HIRALDO, a/k/a "Gordo," [8] JOSE CASTRO-ARROYO, a/k/a "Flo," [9] CHRISTIAN ESCALERA-RODRIGUEZ, a/k/a "Alexis," [10] EDWIN SAMUEL LISBOA-GARCIA, [11] JOSE E. NAVARRO-RIVERA, a/k/a "Label," [12] LUIS D. VAZQUEZ-RIVERA, [13] NICOLAS RIVERA-LUCIANO, [14] LUIS AYALA-HERRERA, a/k/a "Dre," [15] MARIO MACEIRA-ESPIRITUSANTO, [16] HUGO E. OQUENDO-ALEJANDRO, [17] GERARDO I. BETANCOURT-ESTRELLA, [18] NELSON ORTIZ-CHERVONY, a/k/a "Ciego," [19] ORSI GERMAN RODRIGUEZ-CONTRERAS, [20] RUDOLFO TORRES-CORTES, a/k/a "Rudy," [21] JOSE OMAR CARABALLO-NIEVES, [22] EUGENE A. ROMERO-SANTIAGO, [23] ANGEL L. MORALES-SEDA, a/k/a "Angelito," [24] ARMANDO MEDINA-GUZMAN, and [25] JESUS MANUEL LAUREANO-PEREZ, the defendants herein, and others known and unknown, were members and associates of a criminal organization whose members and associates engaged in narcotics distribution and criminal acts principally out of the Luis Munoz Marin International Airport ("LMMIA") in Carolina, Puerto Rico.

2. The criminal organization, including its members and associates, constituted an "enterprise," as defined by Title 18, United States Code, Section 1961(4) ("the enterprise"), that is, a group of individuals associated in fact. The enterprise constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the enterprise. The enterprise was engaged in, and its activities affected, interstate and foreign commerce.

### **Purposes of the Enterprise**

3. The purposes of the enterprise included the following:

- a. Enriching the members and associates of the enterprise through the distribution of narcotics.
- b. Promoting and enhancing the enterprise and its members' and associates' activities.

### **Means and Methods of the Enterprise**

4. Among the means and methods by which the defendants and their associates conducted and participated in the conduct of the affairs of the enterprise were the following:

a. Members of the enterprise used their positions as airport employees to traffic narcotics through the LMMIA in Carolina, Puerto Rico. They used several methods to accomplish this goal, including, but not limited to the following:

i. Members of the enterprise and their associates carried kilograms of cocaine in backpacks/bags into the LMMIA through the employees secured entrance. Once in the secured area, they would transfer the kilograms of cocaine to couriers inside of a designated restroom, who would then board flights departing to the continental United States.

ii. Members of the enterprise and their associates carried kilograms of cocaine hidden on their person into the LMMIA through the employees secured entrance. Once in the secured area, they would transfer the kilograms of cocaine to couriers inside of a designated restroom, who would then board flights departing to the continental United States.

iii. Members of the enterprise with authority to drive official work vehicles onto secured locations of the LMMIA would smuggle suitcases full of cocaine into the

LMMIA. Once in the secured area, the suitcases full of cocaine would be transferred and loaded into waiting commercial aircraft by other members and associates of the enterprise.

iv. Members of the enterprise and their associates carried kilograms of cocaine on their person into the LMMIA through the employees secured entrance. Once in the secured area, they would transfer the kilograms of cocaine to pre-determined suitcases within the baggage area of commercial aircraft.

b. Members of the enterprise and their associates transported, or caused to be transported, large sums of drug proceeds, in the form of U.S. currency, from the continental United States to Puerto Rico.

c. Members of the enterprise and their associates used drug proceeds to purchase items, such as vehicles, which were regularly used to further the enterprise.

#### **Racketeering Conspiracy**

5. From a date unknown to the Grand Jury, but prior to 2010, through and including May 2012, both dates being approximate and inclusive, in the District of Puerto Rico, and elsewhere within the jurisdiction of this Court,

- [1] MARIBEL RODRIGUEZ-FRAGOSO, a/k/a "La Flaca" or "La Nena,"
- [2] ANGEL HERNANDEZ-NUNEZ, a/k/a "Angelito,"
- [3] VICTOR GONZALEZ-CRUZ, a/k/a "Machote,"
- [4] JOSE DAVID SANJURJO-CARILLO, a/k/a "Pipo" or "Gasolinera,"
- [5] ALEXANDER CALDERON-LOPEZ, a/k/a "El De Puertos,"
- [6] CARLOS NATAL-SILVA, a/k/a "Carli" or "Carlitos,"
- [7] FELIX AQUINO-HIRALDO, a/k/a "Gordo,"
- [8] JOSE CASTRO-ARROYO, a/k/a "Flo,"
- [9] CHRISTIAN ESCALERA-RODRIGUEZ, a/k/a "Alexis,"
- [10] EDWIN SAMUEL LISBOA-GARCIA,
- [11] JOSE E. NAVARRO-RIVERA, a/k/a "Label,"
- [12] LUIS D. VAZQUEZ-RIVERA,
- [13] NICOLAS RIVERA-LUCIANO,

[14] LUIS AYALA-HERRERA, a/k/a "Dre,"  
[15] MARIO MACEIRA-ESPIRITUSANTO,  
[16] HUGO E. OQUENDO-ALEJANDRO,  
[17] GERARDO I. BETANCOURT-ESTRELLA,  
[18] NELSON ORTIZ-CHERVONY, a/k/a "Ciego,"  
[19] ORSI GERMAN RODRIGUEZ-CONTRERAS, and  
[20] RUDOLFO TORRES-CORTES, a/k/a "Rudy,"

the defendants herein, and others known and unknown, being persons employed by and associated with the enterprise, which engaged in, and the activities of which affected, interstate and foreign commerce, knowingly and intentionally conspired to violate Title 18, United States Code, Section 1962(c), that is, to conduct and participate, directly and indirectly, in the conduct of the affairs of that enterprise through a pattern of racketeering activity consisting of multiple acts involving narcotics trafficking, including cocaine, in violation of the laws of the United States, that being, Title 21, United States Code, Sections 841 and 846; and multiple acts indictable under Title 18, United States Code, Sections 1956 and 1957 (money laundering).

6. It was a part of the conspiracy that each defendant agreed that a conspirator would commit at least two (2) acts of racketeering activity in the conduct of the affairs of the enterprise.

#### Overt Acts

7. In furtherance of the racketeering conspiracy, and to effect the objects thereof, the defendants and their co-conspirators committed and caused to be committed the following overt acts, among others, on or about the following dates, in the District of Puerto Rico and elsewhere:

a. In or about February 2010 through May 2010, members of the enterprise and their associates, including [3] VICTOR GONZALEZ-CRUZ, a/k/a "Machote," smuggled approximately three-hundred (300) kilograms of cocaine through the LMMIA.

b. In or about the summer of 2010, members of the enterprise and their

associates, including [3] VICTOR GONZALEZ-CRUZ, a/k/a "Machote," [8] JOSE CASTRO-ARROYO, a/k/a "Flo," and [18] NELSON ORTIZ-CHERVONY, a/k/a "Ciego," smuggled kilogram quantities of cocaine through the LMMIA on various occasions.

c. In or about May 2010, members of the enterprise and their associates, including [17] GERARDO I. BETANCOURT-ESTRELLA, smuggled four (4) suitcases containing cocaine through the LMMIA.

d. In or about May 2010, members of the enterprise and their associates, including [16] HUGO E. OQUENDO-ALEJANDRO and [17] GERARDO I. BETANCOURT-ESTRELLA, smuggled six (6) suitcases containing cocaine through the LMMIA.

e. In or about June 2010, members of the enterprise and their associates, including [16] HUGO E. OQUENDO-ALEJANDRO and [17] GERARDO I. BETANCOURT-ESTRELLA, smuggled four (4) suitcases containing cocaine through the LMMIA.

f. On or about June 8, 2010, members of the enterprise and their associates, including [3] VICTOR GONZALEZ-CRUZ, a/k/a "Machote," attempted to smuggle eight (8) kilograms of cocaine to New York through the LMMIA. The eight (8) kilograms of cocaine were seized by law enforcement in Puerto Rico.

g. In or about June 2010, members of the enterprise and their associates, including [16] HUGO E. OQUENDO-ALEJANDRO and [17] GERARDO I. BETANCOURT-ESTRELLA, smuggled two (2) suitcases containing cocaine through the LMMIA.

h. In or about June 2010, members of the enterprise and their associates, including [5] ALEXANDER CALDERON-LOPEZ, a/k/a "El De Puertos," smuggled two (2) suitcases containing cocaine through the LMMIA.

i. In or about July 2010, members of the enterprise and their associates, including [3] VICTOR GONZALEZ-CRUZ, a/k/a "Machote" and [6] CARLOS NATAL-SILVA, a/k/a "Carli" or "Carlitos," smuggled four (4) kilograms of cocaine through the LMMIA.

j. In or about July 2010, members of the enterprise and their associates transported, or caused to be transported, approximately one-hundred and twenty thousand dollars (\$120,000) of drug proceeds from the continental United States to Puerto Rico by way of the LMMIA.

k. In or about August 2010, members of the enterprise and their associates, including [3] VICTOR GONZALEZ-CRUZ, a/k/a "Machote" and [6] CARLOS NATAL-SILVA, a/k/a "Carli" or "Carlitos," smuggled six (6) kilograms of cocaine through the LMMIA.

l. In or about August, 2010, members of the enterprise and their associates transported, or caused to be transported, approximately sixty thousand dollars (\$60,000) of drug proceeds from the continental United States to Puerto Rico by way of the LMMIA.

m. On or about August 24, 2010, members of the enterprise and their associates, including [5] ALEXANDER CALDERON-LOPEZ, a/k/a "El De Puertos," [21] JOSE OMAR CARABALLO-NIEVES, and [22] EUGENE A. ROMERO-SANTIAGO, attempted to smuggle approximately ninety (90) kilograms of cocaine to New Jersey through the LMMIA. The approximately ninety (90) kilograms of cocaine were seized by law enforcement in Puerto Rico.

n. In or about September 2010, members of the enterprise and their associates, including [3] VICTOR GONZALEZ-CRUZ, a/k/a "Machote" and [6] CARLOS NATAL-SILVA, a/k/a "Carli" or "Carlitos," smuggled eight (8) kilograms of cocaine through the LMMIA.

o. In or about September 2010, members of the enterprise and their associates



transported, or caused to be transported, approximately thirty-six thousand dollars (\$36,000) of drug proceeds from the continental United States to Puerto Rico by way of the LMMIA.

p. In or about October 2010, members of the enterprise and their associates, including [3] VICTOR GONZALEZ-CRUZ, a/k/a "Machote" and [6] CARLOS NATAL-SILVA, a/k/a "Carli" or "Carlitos," smuggled eight (8) kilograms of cocaine through the LMMIA.

q. In or about October 2010, members of the enterprise and their associates transported, or caused to be transported, approximately thirty-six thousand dollars (\$36,000) of drug proceeds from the continental United States to Puerto Rico by way of the LMMIA.

r. In or about November 2010, members of the enterprise and their associates, including [3] VICTOR GONZALEZ-CRUZ, a/k/a "Machote" and [6] CARLOS NATAL-SILVA, a/k/a "Carli" or "Carlitos," smuggled five (5) kilograms of cocaine through the LMMIA.

s. In or about November 2010, members of the enterprise and their associates transported, or caused to be transported, approximately eighteen thousand dollars (\$18,000) of drug proceeds from the continental United States to Puerto Rico by way of the LMMIA.

t. On or about November 17, 2010, members of the enterprise and their associates, including [3] VICTOR GONZALEZ-CRUZ, a/k/a "Machote," smuggled four (4) kilograms of cocaine to New York through the LMMIA. The four (4) kilograms of cocaine were seized by law enforcement in New York.

u. On or about November 27, 2010, members of the enterprise and their associates, including [3] VICTOR GONZALEZ-CRUZ, a/k/a "Machote" and [8] JOSE CASTRO-ARROYO, a/k/a "Flo," smuggled six (6) kilograms of cocaine to Florida through the LMMIA. The six (6) kilograms of cocaine were seized by law enforcement in Florida.

v. On or about December 22, 2010, members of the enterprise and their associates, including [3] VICTOR GONZALEZ-CRUZ, a/k/a "Machote," attempted to smuggle one (1) kilogram of cocaine to New York through the LMMIA. The one (1) kilogram of cocaine was seized by law enforcement in Puerto Rico.

w. On or about January 12, 2011, members of the enterprise and their associates, including [3] VICTOR GONZALEZ-CRUZ, a/k/a "Machote" and [19] ORSI GERMAN RODRIGUEZ-CONTRERAS, smuggled four (4) kilograms of cocaine to New York through the LMMIA. The four (4) kilograms of cocaine were seized by law enforcement in New York.

x. In or about January/February 2011, members of the enterprise and their associates, including [3] VICTOR GONZALEZ-CRUZ, a/k/a "Machote" and [6] CARLOS NATAL-SILVA, a/k/a "Carli" or "Carlitos," smuggled four (4) kilograms of cocaine through the LMMIA.

y. In or about January/February 2011, members of the enterprise and their associates transported, or caused to be transported, approximately eighteen thousand dollars (\$18,000) of drug proceeds from the continental United States to Puerto Rico by way of the LMMIA.

z. On or about February 8, 2011, members of the enterprise and their associates, including [3] VICTOR GONZALEZ-CRUZ, a/k/a "Machote" and [6] CARLOS NATAL-SILVA, a/k/a "Carli" or "Carlitos," smuggled one (1) kilogram of cocaine to Pennsylvania through the LMMIA. The one (1) kilogram of cocaine was seized by law enforcement in Pennsylvania.

aa. On or about June 17, 2011, members of the enterprise and their associates, including [1] MARIBEL RODRIGUEZ-FRAGOSO, a/k/a "La Flaca" or "La Nena," [2] ANGEL HERNANDEZ-NUNEZ, a/k/a "Angelito," [5] ALEXANDER CALDERON-LOPEZ, a/k/a "El De Puertos," and [7] FELIX AQUINO-HIRALDO, a/k/a "Gordo," smuggled twenty-nine (29) kilograms

of cocaine to New Jersey through the LMMIA. The twenty-nine (29) kilograms of cocaine were seized by law enforcement in New Jersey.

bb. On or about July 8, 2011, members of the enterprise and their associates, including [1] MARIBEL RODRIGUEZ-FRAGOSO, a/k/a "La Flaca" or "La Nena," [2] ANGEL HERNANDEZ-NUNEZ, a/k/a "Angelito," and [4] JOSE DAVID SANJURJO-CARILLO, a/k/a "Pipo" or "Gasolinera," attempted to smuggle sixty-two (62) kilograms of cocaine to Maryland through the LMMIA. The sixty-two (62) kilograms of cocaine were seized by law enforcement in Puerto Rico.

cc. In or about July/August 2011, members of the enterprise and their associates, including [8] JOSE CASTRO-ARROYO, a/k/a "Flo," [9] CHRISTIAN ESCALERA-RODRIGUEZ, a/k/a "Alexis," and [10] EDWIN SAMUEL LISBOA-GARCIA, smuggled approximately forty (40) kilograms of cocaine through the LMMIA.

dd. In or about August 2011, members of the enterprise and their associates, including [8] JOSE CASTRO-ARROYO, a/k/a "Flo," [9] CHRISTIAN ESCALERA-RODRIGUEZ, a/k/a "Alexis," [10] EDWIN SAMUEL LISBOA-GARCIA, and [11] JOSE E. NAVARRO-RIVERA, a/k/a "Label," smuggled ten (10) kilograms of cocaine through the LMMIA.

ee. In or about August 2011, members of the enterprise and their associates, including [8] JOSE CASTRO-ARROYO, a/k/a "Flo," [9] CHRISTIAN ESCALERA-RODRIGUEZ, a/k/a "Alexis," [10] EDWIN SAMUEL LISBOA-GARCIA, and [11] JOSE E. NAVARRO-RIVERA, a/k/a "Label," smuggled ten (10) kilograms of cocaine through the LMMIA.

ff. In or about September 2011, members of the enterprise and their associates, including [1] MARIBEL RODRIGUEZ-FRAGOSO, a/k/a "La Flaca" or "La Nena" and [12] LUIS

D. VAZQUEZ-RIVERA, smuggled four (4) kilograms of cocaine through the LMMIA.

gg. On or about September 7, 2011, members of the enterprise and their associates, including [12] LUIS D. VAZQUEZ-RIVERA and [25] JESUS MANUEL LAUREANO-PEREZ, attempted to smuggle one (1) kilogram of cocaine to New York through the LMMIA. The one (1) kilogram of cocaine was seized by law enforcement in Puerto Rico.

hh. In or about June through September 2011, members of the enterprise and their associates, including [3] VICTOR GONZALEZ-CRUZ, a/k/a "Machote" and [6] CARLOS NATAL-SILVA, a/k/a "Carli" or "Carlitos," smuggled fifteen (15) kilograms of cocaine through the LMMIA.

ii. In or about June through September 2011, members of the enterprise and their associates transported, or caused to be transported, approximately fifty-four thousand dollars (\$54,000) of drug proceeds from the continental United States to Puerto Rico by way of the LMMIA.

jj. On or about September 15, 2011, members of the enterprise and their associates, including [9] CHRISTIAN ESCALERA-RODRIGUEZ, a/k/a "Alexis" and [15] MARIO MACEIRA-ESPIRITUSANTO, smuggled twelve (12) kilograms of cocaine to New York through the LMMIA. The twelve (12) kilograms of cocaine were seized by law enforcement in New York.

kk. On or about September 15, 2011, members of the enterprise and their associates, including [3] VICTOR GONZALEZ-CRUZ, a/k/a "Machote," [6] CARLOS NATAL-SILVA, a/k/a "Carli" or "Carlitos," [9] CHRISTIAN ESCALERA-RODRIGUEZ, a/k/a "Alexis," and [15] MARIO MACEIRA-ESPIRITUSANTO, attempted to smuggle ten (10) kilograms of cocaine to Massachusetts through the LMMIA. The ten (10) kilograms of cocaine were seized by law enforcement in Puerto Rico.

ll. In or about October 2011, members of the enterprise and their associates,

including [12] LUIS D. VAZQUEZ-RIVERA, [13] NICOLAS RIVERA-LUCIANO, and [20] RUDOLFO TORRES-CORTES, a/k/a "Rudy," smuggled six (6) kilograms of cocaine through the LMMIA.

mm. On or about October 23, 2011, members of the enterprise and their associates, including [4] JOSE DAVID SANJURJO-CARILLO, a/k/a "Pipo" or "Gasolinera" and [23] ANGEL L. MORALES-SEDA, attempted to smuggle fifty-one (51) kilograms of cocaine to Pennsylvania through the LMMIA. The fifty-one (51) kilograms of cocaine were seized by law enforcement in Puerto Rico.

nn. On or about October 27, 2011, members of the enterprise and their associates, including [13] NICOLAS RIVERA-LUCIANO, [14] LUIS AYALA-HERRERA, a/k/a "Dre," [20] RUDOLFO TORRES-CORTES, a/k/a "Rudy," and [24] ARMANDO MEDINA-GUZMAN, smuggled six (6) kilograms of cocaine to Florida through the LMMIA. The six (6) kilograms of cocaine were seized by law enforcement in Florida.

All in violation of Title 18, United States Code, Section 1962(d).

**Notice of Special Findings for Count One**  
**(Conspiracy to Possess with Intent to Distribute a Controlled Substance)**

From a date unknown to the Grand Jury, but prior to 2010, through and including May 2012, both dates being approximate and inclusive, in the District of Puerto Rico, and elsewhere within the jurisdiction of this Court,

- [1] MARIBEL RODRIGUEZ-FRAGOSO, a/k/a "La Flaca" or "La Nena,"
- [2] ANGEL HERNANDEZ-NUNEZ, a/k/a "Angelito,"
- [3] VICTOR GONZALEZ-CRUZ, a/k/a "Machote,"
- [4] JOSE DAVID SANJURJO-CARILLO, a/k/a "Pipo" or "Gasolinera,"
- [5] ALEXANDER CALDERON-LOPEZ, a/k/a "El De Puertos,"
- [6] CARLOS NATAL-SILVA, a/k/a "Carli" or "Carlitos,"
- [7] FELIX AQUINO-HIRALDO, a/k/a "Gordo,"
- [8] JOSE CASTRO-ARROYO, a/k/a "Flo,"
- [9] CHRISTIAN ESCALERA-RODRIGUEZ, a/k/a "Alexis,"
- [10] EDWIN SAMUEL LISBOA-GARCIA,
- [11] JOSE E. NAVARRO-RIVERA, a/k/a "Label,"
- [12] LUIS D. VAZQUEZ-RIVERA,
- [13] NICOLAS RIVERA-LUCIANO,
- [14] LUIS AYALA-HERRERA, a/k/a "Dre,"
- [15] MARIO MACEIRA-ESPIRITUSANTO,
- [16] HUGO E. OQUENDO-ALEJANDRO,
- [17] GERARDO I. BETANCOURT-ESTRELLA,
- [18] NELSON ORTIZ-CHERVONY, a/k/a "Ciego,"
- [19] ORSI GERMAN RODRIGUEZ-CONTRERAS, and
- [20] RUDOLFO TORRES-CORTES, a/k/a "Rudy,"

the defendants herein, did knowingly and intentionally combine, confederate, and agree with each other and other persons, known and unknown, to commit an offense against the United States, that is: to possess with intent to distribute five (5) kilograms or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II Narcotic Drug Controlled Substance, in violation of Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Section 846.

## **COUNT TWO**

### **(Conspiracy to Possess with Intent to Distribute a Controlled Substance)**

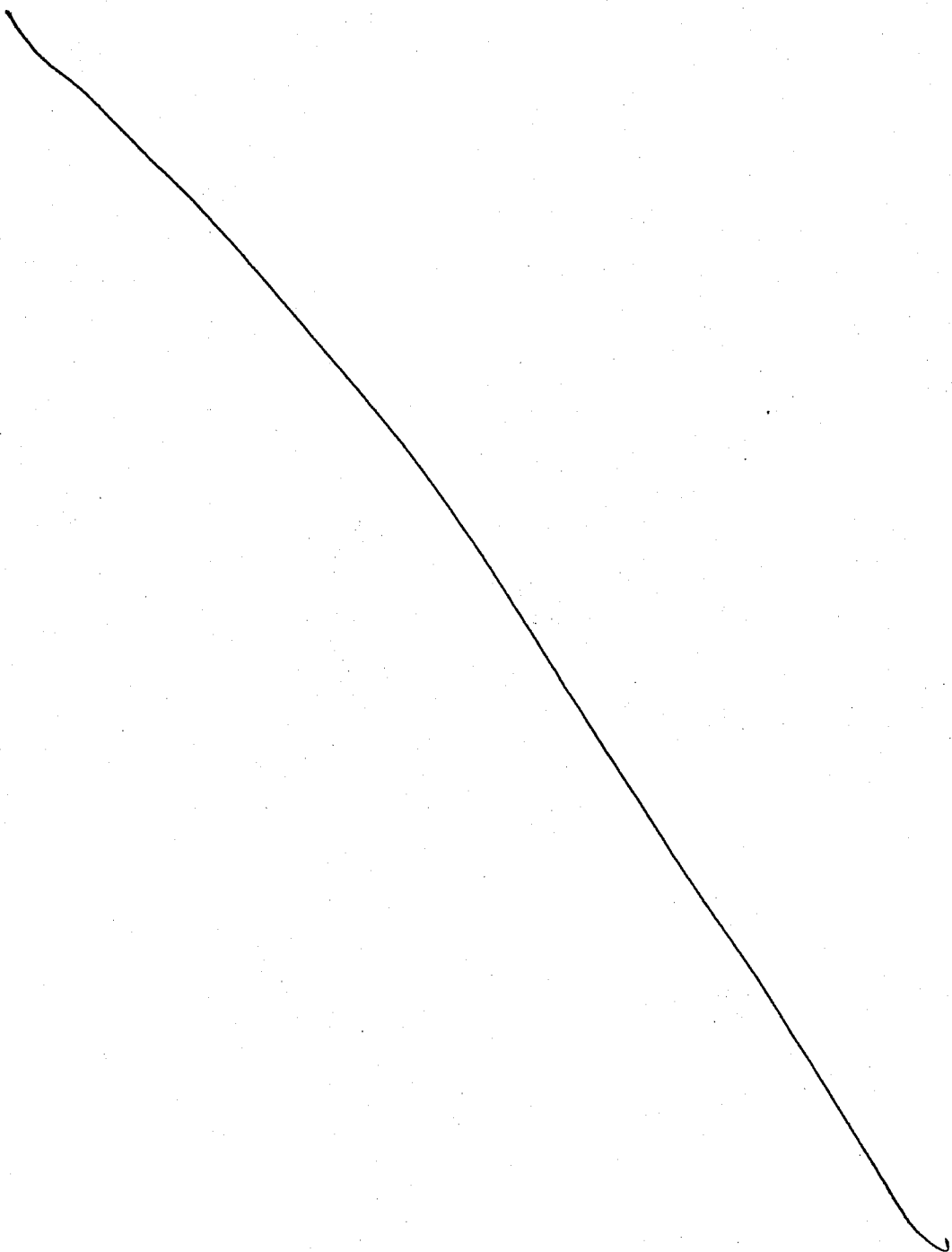
From a date unknown to the Grand Jury, but prior to 2010, through and including May 2012, both dates being approximate and inclusive, in the District of Puerto Rico, and elsewhere within the jurisdiction of this Court,

- [1] MARIBEL RODRIGUEZ-FRAGOSO, a/k/a "La Flaca" or "La Nena,"**
- [2] ANGEL HERNANDEZ-NUNEZ, a/k/a "Angelito,"**
- [3] VICTOR GONZALEZ-CRUZ, a/k/a "Machote,"**
- [4] JOSE DAVID SANJURJO-CARILLO, a/k/a "Pipo" or "Gasolinera,"**
- [5] ALEXANDER CALDERON-LOPEZ, a/k/a "El De Puertos,"**
- [6] CARLOS NATAL-SILVA, a/k/a "Carli" or "Carlitos,"**
- [7] FELIX AQUINO-HIRALDO, a/k/a "Gordo,"**
- [8] JOSE CASTRO-ARROYO, a/k/a "Flo,"**
- [9] CHRISTIAN ESCALERA-RODRIGUEZ, a/k/a "Alexis,"**
- [10] EDWIN SAMUEL LISBOA-GARCIA,**
- [11] JOSE E. NAVARRO-RIVERA, a/k/a "Label,"**
- [12] LUIS D. VAZQUEZ-RIVERA,**
- [13] NICOLAS RIVERA-LUCIANO,**
- [14] LUIS AYALA-HERRERA, a/k/a "Dre,"**
- [15] MARIO MACEIRA-ESPIRITUSANTO,**
- [16] HUGO E. OQUENDO-ALEJANDRO,**
- [17] GERARDO I. BETANCOURT-ESTRELLA,**
- [18] NELSON ORTIZ-CHERVONY, a/k/a "Ciego,"**
- [19] ORSI GERMAN RODRIGUEZ-CONTRERAS,**
- [20] RUDOLFO TORRES-CORTES, a/k/a "Rudy,"**
- [21] JOSE OMAR CARABALLO-NIEVES,**
- [22] EUGENE A. ROMERO-SANTIAGO,**
- [23] ANGEL L. MORALES-SEDA, a/k/a "Angelito,"**
- [24] ARMANDO MEDINA-GUZMAN, and**
- [25] JESUS MANUEL LAUREANO-PEREZ,**

the defendants herein, did knowingly and intentionally combine, confederate, and agree with each other and other persons, known and unknown to the Grand Jury, to commit an offense against the United States, that is: to possess with intent to distribute five (5) kilograms or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II Narcotic Drug Controlled

Substance, in violation of Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Section 846.





### **COUNT THREE**

On or about the 8th day of June, 2010, in the District of Puerto Rico, and elsewhere within the jurisdiction of this Court,

**[3] VICTOR GONZALEZ-CRUZ, a/k/a "Machote,"**

the defendant herein, aided and abetted by others known and unknown, did knowingly and intentionally possess with the intent to distribute five (5) kilograms or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II Narcotic Drug Controlled Substance.

All in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

#### **COUNT FOUR**

On or about the 24th day of August, 2010, in the District of Puerto Rico, and elsewhere within the jurisdiction of this Court,

**[5] ALEXANDER CALDERON-LOPEZ, a/k/a "El De Puertos,"**  
**[21] JOSE OMAR CARABALLO-NIEVES, and**  
**[22] EUGENE A. ROMERO-SANTIAGO,**

the defendants herein, aiding and abetting each other and others known and unknown, did knowingly and intentionally possess with the intent to distribute five (5) kilograms or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II Narcotic Drug Controlled Substance.

All in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

**COUNT FIVE**

On or about the 17th day of November, 2010, in the District of Puerto Rico, New York, and elsewhere within the jurisdiction of this Court,

**[3] VICTOR GONZALEZ-CRUZ, a/k/a "Machote,"**

the defendant herein, aided and abetted by others known and unknown, did knowingly and intentionally possess with the intent to distribute five hundred (500) grams or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II Narcotic Drug Controlled Substance.

All in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

**COUNT SIX**

On or about the 27th day of November, 2010, in the District of Puerto Rico, Florida, and elsewhere within the jurisdiction of this Court,

**[3] VICTOR GONZALEZ-CRUZ, a/k/a "Machote," and  
[8] JOSE CASTRO-ARROYO, a/k/a "Flo,"**

the defendants herein, aiding and abetting each other and others known and unknown, did knowingly and intentionally possess with the intent to distribute five (5) kilograms or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II Narcotic Drug Controlled Substance.

All in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

**COUNT SEVEN**

On or about the 22nd day of December, 2010, in the District of Puerto Rico, and elsewhere within the jurisdiction of this Court,

**[3] VICTOR GONZALEZ-CRUZ, a/k/a "Machote,"**

the defendant herein, aided and abetted by others known and unknown, did knowingly and intentionally possess with the intent to distribute five hundred (500) grams or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II Narcotic Drug Controlled Substance.

All in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

**COUNT EIGHT**

On or about the 12th day of January, 2011, in the District of Puerto Rico, New York, and elsewhere within the jurisdiction of this Court,

**[3] VICTOR GONZALEZ-CRUZ, a/k/a "Machote," and  
[19] ORSI GERMAN RODRIGUEZ-CONTRERAS,**

the defendants herein, aiding and abetting each other and others known and unknown, did knowingly and intentionally possess with the intent to distribute five hundred (500) grams or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II Narcotic Drug Controlled Substance.

All in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

**COUNT NINE**

On or about the 8th day of February, 2011, in the District of Puerto Rico, Pennsylvania, and elsewhere within the jurisdiction of this Court,

**[3] VICTOR GONZALEZ-CRUZ, a/k/a “Machote,” and  
[6] CARLOS NATAL-SILVA, a/k/a “Carli” or “Carlitos,”**

the defendants herein, aiding and abetting each other and others known and unknown, did knowingly and intentionally possess with the intent to distribute five hundred (500) grams or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II Narcotic Drug Controlled Substance.

All in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

**COUNT TEN**

On or about the 17th day of June, 2011, in the District of Puerto Rico, New Jersey, and elsewhere within the jurisdiction of this Court,

**[1] MARIBEL RODRIGUEZ-FRAGOSO, a/k/a "La Flaca" or "La Nena,"**  
**[2] ANGEL HERNANDEZ-NUNEZ, a/k/a "Angelito,"**  
**[5] ALEXANDER CALDERON-LOPEZ, a/k/a "El De Puertos," and**  
**[7] FELIX AQUINO-HIRALDO, a/k/a "Gordo,"**

the defendants herein, aiding and abetting each other and others known and unknown, did knowingly and intentionally possess with the intent to distribute five (5) kilograms or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II Narcotic Drug Controlled Substance.

All in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.



**COUNT ELEVEN**

On or about the 8th day of July, 2011, in the District of Puerto Rico, and elsewhere within the jurisdiction of this Court,

**[1] MARIBEL RODRIGUEZ-FRAGOSO, a/k/a "La Flaca" or "La Nena,"**  
**[2] ANGEL HERNANDEZ-NUNEZ, a/k/a "Angelito," and**  
**[4] JOSE DAVID SANJURJO-CARILLO, a/k/a "Pipo" or "Gasolinera,"**

the defendants herein, aiding and abetting each other and others known and unknown, did knowingly and intentionally possess with the intent to distribute five (5) kilograms or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II Narcotic Drug Controlled Substance.

All in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

**COUNT TWELVE**

On or about the 7th day of September, 2011, in the District of Puerto Rico, and elsewhere within the jurisdiction of this Court,

**[12] LUIS D. VAZQUEZ-RIVERA, and  
[25] JESUS MANUEL LAUREANO-PEREZ,**

the defendants herein, aiding and abetting each other and others known and unknown, did knowingly and intentionally possess with the intent to distribute five hundred (500) grams or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II Narcotic Drug Controlled Substance.

All in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

**COUNT THIRTEEN**

On or about the 15th day of September, 2011, in the District of Puerto Rico, New York, and elsewhere within the jurisdiction of this Court,

**[9] CHRISTIAN ESCALERA-RODRIGUEZ, a/k/a "Alexis," and  
[15] MARIO MACEIRA-ESPIRITUSANTO,**

the defendants herein, aiding and abetting each other and others known and unknown, did knowingly and intentionally possess with the intent to distribute five (5) kilograms or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II Narcotic Drug Controlled Substance.

All in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

### **COUNT FOURTEEN**

On or about the 15th day of September, 2011, in the District of Puerto Rico, and elsewhere within the jurisdiction of this Court,

**[3] VICTOR GONZALEZ-CRUZ, a/k/a "Machote,"**  
**[6] CARLOS NATAL-SILVA, a/k/a "Carli" or "Carlitos,"**  
**[9] CHRISTIAN ESCALERA-RODRIGUEZ, a/k/a "Alexis," and**  
**[15] MARIO MACEIRA-ESPIRITUSANTO,**

the defendants herein, aiding and abetting each other and others known and unknown, did knowingly and intentionally possess with the intent to distribute five (5) kilograms or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II Narcotic Drug Controlled Substance.

All in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

**COUNT FIFTEEN**

On or about the 23rd day of October, 2011, in the District of Puerto Rico, and elsewhere within the jurisdiction of this Court,

**[4] JOSE DAVID SANJURJO-CARILLO, a/k/a "Pipo" or "Gasolinera," and  
[23] ANGEL L. MORALES-SEDA, a/k/a "Angelito,"**

the defendants herein, aiding and abetting each other and others known and unknown, did knowingly and intentionally possess with the intent to distribute five (5) kilograms or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II Narcotic Drug Controlled Substance.

All in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

**COUNT SIXTEEN**

On or about the 27th day of October, 2011, in the District of Puerto Rico, Florida, and elsewhere within the jurisdiction of this Court,

**[13] NICOLAS RIVERA-LUCIANO,  
[14] LUIS AYALA-HERRERA, a/k/a "Dre,"  
[20] RUDOLFO TORRES-CORTES, a/k/a "Rudy," and  
[24] ARMANDO MEDINA-GUZMAN,**

the defendants herein, aiding and abetting each other and others known and unknown, did knowingly and intentionally possess with the intent to distribute five (5) kilograms or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II Narcotic Drug Controlled Substance.

All in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

## RICO FORFEITURE

1. The allegations contained in Count One of this Indictment are hereby repeated, realleged, and incorporated by reference herein as though fully set forth at length for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Section 1963.

2. Pursuant to Title 18, United States Code, Section 1963, upon conviction of an offense in violation of Title 18, United States Code, Section 1962, the defendants,

- [1] MARIBEL RODRIGUEZ-FRAGOSO, a/k/a "La Flaca" or "La Nena,"
- [2] ANGEL HERNANDEZ-NUNEZ, a/k/a "Angelito,"
- [3] VICTOR GONZALEZ-CRUZ, a/k/a "Machote,"
- [4] JOSE DAVID SANJURJO-CARILLO, a/k/a "Pipo" or "Gasolinera,"
- [5] ALEXANDER CALDERON-LOPEZ, a/k/a "El De Puertos,"
- [6] CARLOS NATAL-SILVA, a/k/a "Carli" or "Carlitos,"
- [7] FELIX AQUINO-HIRALDO, a/k/a "Gordo,"
- [8] JOSE CASTRO-ARROYO, a/k/a "Flo,"
- [9] CHRISTIAN ESCALERA-RODRIGUEZ, a/k/a "Alexis,"
- [10] EDWIN SAMUEL LISBOA-GARCIA,
- [11] JOSE E. NAVARRO-RIVERA, a/k/a "Label,"
- [12] LUIS D. VAZQUEZ-RIVERA,
- [13] NICOLAS RIVERA-LUCIANO,
- [14] LUIS AYALA-HERRERA, a/k/a "Dre,"
- [15] MARIO MACEIRA-ESPIRITUSANTO,
- [16] HUGO E. OQUENDO-ALEJANDRO,
- [17] GERARDO I. BETANCOURT-ESTRELLA,
- [18] NELSON ORTIZ-CHERVONY, a/k/a "Ciego,"
- [19] ORSI GERMAN RODRIGUEZ-CONTRERAS, and
- [20] RUDOLFO TORRES-CORTES, a/k/a "Rudy,"

shall forfeit to the United States of America:

- a. any interest acquired or maintained in violation of section 1962;
- b. any interest in, security of, claim against, or property or contractual right of any kind affording a source of influence over, any enterprise which the defendants established, operated, controlled, conducted, or participated in the

conduct of, in violation of section 1962; and

- c. any property constituting, or derived from, any proceeds obtained, directly or indirectly, from racketeering activity or unlawful debt collection in violation of 1962.

The property to be forfeited includes, but is not limited to: at least \$14,500,000.00.

3. If any of the property described above, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 18, United States Code, Section 1963(m), including but not limited to:

a) All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at Barrio Ciénega, Río Grande, Puerto Rico, more particularly described as:

URBANA: Solar radicado en la Urbanización Alturas de Río Grande, situado en el Barrio Ciénega de Río Grande, Puerto Rico, que se describe con el No. 135 del Bloque "C", con un área de 307.44 metros cuadrados. En lindes por el NORTE, en 12.81 metros, con el solar No. 100 del bloque "C"; por el SUR, en 12.81 metros, con la Calle No. 3 (Río Amazonas); por el ESTE, en 24.00 metros, con el solar No. 134 del bloque "C"; y por el OESTE, en 24.00 metros, con el solar No. 136 del Bloque "C". Enclava una casa.



URBAN: Lot set in Alturas de Rio Grande Development, located in Cienaga Ward of Rio Grande, Puerto Rico, described with No. 135 of Block "C", with an area of 307.44 square meters. Its boundaries are on the NORTH, in 12.81 meters, with Lot No. 100 of Block "C"; by the SOUTH, in 12.81 meters, with Street No. 3 (Amazonas River); on the EAST, in 24.00 meters, with Lot No. 134 of Block "C"; and on the WEST, in 24.00 meters, with Lot No. 136 of Block "C". Holds a house. (*Translation supplied*)

Property No. 5510, recorded at page 81 overleaf of volume 108 of Rio Grande. Registry of Property, Third Section of Carolina.

Owner: Hugo Oquendo-Alejandro (single).

b) All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at Barrio Las Cuevas, Trujillo Alto, Puerto Rico, more particularly described as:

URBANA: Propiedad Horizontal: Apartamento No. I-103 del Condominio Woodlands, localizado en el Barrio Las Cuevas del término Municipal de Trujillo Alto, Puerto Rico, localizado en el tercer piso del Edificio "T", con un área de construcción total de 1,281.66 metros cuadrados, equivalentes a 119.07 metros cuadrados. Siendo sus linderos los siguientes: Por el NORTE, en una distancia de 48'11", equivalentes a 14.91 metros, con el apartamento No. H-203; por el SUR, en una distancia de 51'8-1/2", equivalentes a 15.761 metros, con el apartamento No. I-203 y área común; por el ESTE, en una distancia de 33'11", equivalentes a 10.338 metros, con espacio aéreo; y por el OESTE, en una distancia de 24'1-1/2", equivalentes a 7.353 metros, con espacio aéreo. Contiene vestíbulo, sala-comedor, cocina, lavandería, dos dormitorios, dos baños equipados, sala familiar y guardarropas. Su puerta de entrada esta localizada al Oeste del apartamento desde la cual se tiene acceso a la escalera que conduce a la calle. A este unidad se le ha asignado el uso exclusivo de dos espacios de estacionamientos enumerados ambos 98. Le corresponde a este apartamento el 0.4945% en los elementos comunes generales del inmueble.

URBAN: Horizontal Property: Apartment No. I-103 of Woodlands Condominium, located in Las Cuevas Ward of the Municipality of Trujillo Alto, Puerto Rico, located in the third floor of Building "T", with a total area of construction of 1,281.66 square meters, equivalent to 119.07 square meters. Being its boundaries the following: To the NORTH, in a distance of 48'11", equivalent to 14.91 meters, with apartment No. H-203; to the SOUTH in a distance of 51'8-1/2", equivalent to 15.761 meters, with

apartment No. I-203 and a common area; to the EAST, in a distance of 33'11", equivalent to 10.338 meters, with aerial space; and to the WEST, in a distance of 24'1-1/2", equivalent to 7.353 meters with aerial space. Contains foyer, living and dining room, kitchen, laundry, two bedrooms, two equipped bathrooms, den, and closets. Its entrance door is located on the West of the apartment from which there is access to a stairway that leads to the street. This unit is assigned the exclusive use of two parking spaces enumerated 98. 0.4945% of the general elements in common of the real property correspond to this apartment. (*Translation supplied*)

**Property No. 32602**, recorded at page 17 of volume 822 of Trujillo Alto. Registry of Property, Fourth Section of San Juan.

Registered owners: Alexander Calderón-López (single) and Luz Esmirna Miranda-Martínez (single).

c) All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at Barrio Ciénaga Baja, Río Grande, Puerto Rico, more particularly described as:

URBANA: parcela de terreno localizada en la Calle No. 17 de la Urbanización Villas de Cambalache II, Barrio Ciénaga Baja, Municipio de Río Grande, Puerto Rico, identificado en el plano de inscripción aprobado por la Administración de Reglamentos y Permisos de Puerto Rico para la Urbanización como solar No. S-32. El mismo tiene una cabida superficial de 336.00 metros cuadrados. En lindes por el NORTE, con el lote No. S-2, distancia de 14.00 metros lineales; por el SUR, con la Calle No. 17, distancia de 14.00 metros lineales; por el ESTE con el lote No. S-33, distancia de 24.00 metros lineales; y por el OESTE, con el lote No. S-31, distancia de 24.00 metros lineales. En el solar enclava una estructura de hormigón armado y bloques, consiste la misma de tres cuartos dormitorios, dos baños, cocina, sala-comedor, marquesina y demás dependencias.

URBAN: lot of land located in Street No. 17 of Villas de Cambalache II, Cienaga Baja Ward, Municipality of Río Grande, Puerto Rico, identified in the inscription blueprints approved by the Puerto Rico Administration of Regulations and Permits for the Development as Lot No. S-32. The same has a surface area of 336.00 square meters. In boundaries on the NORTH, with Lot No. S-2, distance of 14.00 linear meters; on the SOUTH, with Street No. 17, distance of 14.00 linear meters; on the EAST with Lot No. S-33, distance of 24.00 linear meters; and on the WEST, with Lot No. S-31, distance of 24.00 linear meters. The lot contains a block and concrete structure, consisting of three bedrooms, two bathrooms, kitchen, living dining room, terrace, and other dependancies. (*Translation supplied*)

**Property No. 29637**, recorded at page 13 of volume 522 of Rio Grande. Registry of Property, Third Section of Carolina.

Registered owners: José David Sanjurjo-Carrillo and in favor of Yadira Rodríguez-Pérez.

4. The above-named defendants, and each of them, are jointly and severally liable for the forfeiture obligations as alleged above.

All pursuant to Title 18, United States Code, Section 1963.

## NARCOTICS FORFEITURE

1. The allegations contained in Count Two of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 21, United States Code, Section 853. Upon conviction of the offense in violation of Title 21, United States Code, Section 846, set forth in Count Two of this Indictment, the defendants,

- [1] MARIBEL RODRIGUEZ-FRAGOSO, a/k/a "La Flaca" or "La Nena,"
- [2] ANGEL HERNANDEZ-NUNEZ, a/k/a "Angelito,"
- [3] VICTOR GONZALEZ-CRUZ, a/k/a "Machote,"
- [4] JOSE DAVID SANJURJO-CARILLO, a/k/a "Pipo" or "Gasolinera,"
- [5] ALEXANDER CALDERON-LOPEZ, a/k/a "El De Puertos,"
- [6] CARLOS NATAL-SILVA, a/k/a "Carli" or "Carlitos,"
- [7] FELIX AQUINO-HIRALDO, a/k/a "Gordo,"
- [8] JOSE CASTRO-ARROYO, a/k/a "Flo,"
- [9] CHRISTIAN ESCALERA-RODRIGUEZ, a/k/a "Alexis,"
- [10] EDWIN SAMUEL LISBOA-GARCIA,
- [11] JOSE E. NAVARRO-RIVERA, a/k/a "Label,"
- [12] LUIS D. VAZQUEZ-RIVERA,
- [13] NICOLAS RIVERA-LUCIANO,
- [14] LUIS AYALA-HERRERA, a/k/a "Dre,"
- [15] MARIO MACEIRA-ESPIRITUSANTO,
- [16] HUGO E. OQUENDO-ALEJANDRO,
- [17] GERARDO I. BETANCOURT-ESTRELLA,
- [18] NELSON ORTIZ-CHERVONY, a/k/a "Ciego,"
- [19] ORSI GERMAN RODRIGUEZ-CONTRERAS,
- [20] RUDOLFO TORRES-CORTES, a/k/a "Rudy,"
- [21] JOSE OMAR CARABALLO-NIEVES,
- [22] EUGENE A. ROMERO-SANTIAGO,
- [23] ANGEL L. MORALES-SEDA, a/k/a "Angelito,"
- [24] ARMANDO MEDINA-GUZMAN, and
- [25] JESUS MANUEL LAUREANO-PEREZ,

shall forfeit to the United States pursuant to Title 21, United States Code, Section 853, any property constituting, or derived from, proceeds obtained, directly or indirectly, as a result of said violation and any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of said violation, including but not limited to the following: all rights, title, and interest

in all property constituting, or derived from, any proceeds defendants obtained, directly or indirectly, as a result of the offense described in Count Two of this Indictment and all property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of the violation alleged in Count Two of this Indictment, including, but not limited to, \$14,500,000.00.

2. If any of the property described above, as a result of any act or omission of the defendants:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America, pursuant to Title 21, United States Code, Section 853(p), shall be entitled to forfeiture of substitute property, **including but not limited to:**

a) Property No. 5510, recorded at page 81 overleaf of volume 108 of Rio Grande. Registry of Property, Third Section of Carolina, more fully described in pages 32 and 33 of the present Indictment.

b) Property No. 32602, recorded at page 17 of volume 822 of Trujillo Alto. Registry of Property, Fourth Section of San Juan, more fully described in pages 33 and 34 of the present Indictment.

c) Property No. 29637, recorded at page 13 of volume 522 of Rio Grande. Registry of Property, Third Section of Carolina, more fully described in pages 34 and 35 of the

present Indictment.

All pursuant to Title 21, United States Code, Section 853.

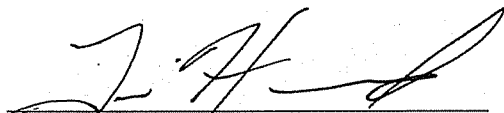
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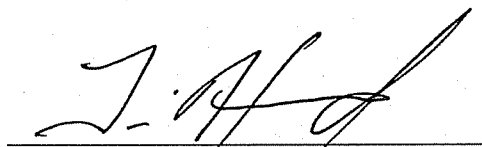
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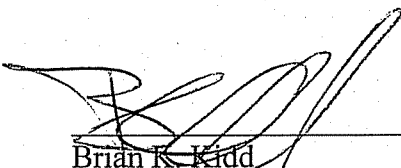
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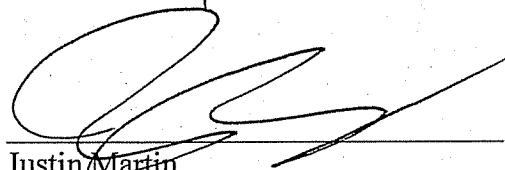
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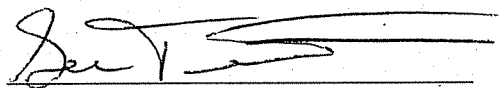
**ROSA EMILIA RODRÍGUEZ-VÉLEZ**  
**UNITED STATES ATTORNEY**

  
for: José A. Ruiz-Santiago  
Assistant United States Attorney  
Chief, Criminal Division

  
Timothy Henwood  
Assistant United States Attorney  
Chief, Organized Crime and Racketeering Unit

  
Brian K. Kidd  
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Justin Martin  
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Sean M. Torriente  
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